

pretrial conference on June 13, 2025 at 3 p.m. in Courtroom 1506, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007. No later than April 1, 2025, the parties shall advise the Court how long they anticipate trial will last.

Michael J. Willemin mwillemin@wigdorlaw.com

March 17, 2025

VIA ECF

The Honorable Ronnie Abrams Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 Plaintiff's letter also references a potential dispute over expert discovery. The Court takes no position on whether that dispute is timely raised. No later than March 21, 2025, the parties shall bring the issue to Magistrate Judge Gorenstein's attention pursuant to the order of reference previously entered in this case. *See* Dkt. 139. The parties shall notify the Court within two days of Judge Gorenstein's ruling on this issue.

SO ORDERED.

Hon. Ronnie Abrams March 18, 2025

Re: Eckhart v. Fox News Network, LLC, et al.; Case No. 20-cv-5593 (RA)(GWG)

Dear Judge Abrams,

We represent Plaintiff in this action against Defendant Ed Henry. We write on behalf of both parties to seek an adjournment of the trial currently set for May 12, 2025. We respectfully request that the trial be scheduled to begin in the first half of June 2025 if that time is convenient to the Court.

This request is made for two primary reasons. First, counsel for both parties have scheduling conflicts. Plaintiff's counsel is scheduled to be away during periods of time that would involve significant pretrial filings and work, and defense counsel has an arbitration that is already scheduled for the week of May 12, 2025. Second, it is Plaintiff's position that expert discovery never closed and explicitly continued to run concurrent with the summary judgment filings to provide the parties with an opportunity to obtain all relevant medical records consistent with a prior order of this Court (and to serve expert disclosures and reports subsequent to the acquisition of those records). As such, Plaintiff intends to prepare and submit expert disclosures before trial. For his part, Defendant may take the position that expert discovery is closed and object to any disclosures. Either way, the requested adjournment will give the parties time to meet and confer on this issue and, if appropriate, complete any outstanding expert discovery prior to trial.

We thank Your Honor for the Court's time and consideration of this matter.

Respectfully submitted,

Michael J. Willemin